

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO:

*Gaston Roberts et al. v. Zhejiang
Huahai Pharmaceutical Co., et al.,*

Case No. 1:20-cv-00946-RBK-JS

MDL No. 2875

Honorable Renée Marie Bumb
District Court Judge

**DECLARATION OF NINA ROSE IN SUPPORT OF DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT AND STATEMENT OF MATERIAL FACTS NOT
IN DISPUTE**

I, Nina Rose, declare as follows:

I am an attorney and a partner with the law firm Kirkland & Ellis LLP, counsel for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, and Princeton Pharmaceutical Inc. ("Defendants") in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Declaration in Support of Defendants' Memorandum of Law in Support of Motion for Summary Judgment and Defendants' Statement of Material Facts Not in Dispute.

1. Attached hereto as **Exhibit 1** is a true and correct copy of the Second Amended Plaintiff Fact Sheet.
2. Attached hereto as **Exhibit 2** is a true and correct copy of bates stamped

documents GRobertsJr-DCPOA-0000001 and GRobertsJr-CA-000014.

3. Attached hereto as **Exhibit 3** is a true and correct copy of the Complaint in *Kruk v. Zhejiang Huahai Pharm. Co.*, No. 18-cv-005944 (N.D. Ill. Aug. 29, 2018).
4. Attached hereto as **Exhibit 4** is a true and correct copy of Willy Gomm et al., *N-Nitrosodimethylamine-Contaminated Valsartan and the Risk of Cancer*, 118 Deutsches Arzteblatt Int'l 357 (2021).
5. Attached hereto as **Exhibit 5** is a true and correct copy of Imene Mansouri et al., *N-nitrosodimethylamine-Contaminated Valsartan and Risk of Cancer: A Nationwide Study of 1.4 Million Valsartan Users*, 11(24) J. Am. Heart Ass'n 1 (2022).
6. Attached hereto as **Exhibit 6** is a true and correct copy of the Deposition Transcript of Dr. William Sawyer, Ph.D., dated May 1, 2025.
7. Attached hereto as **Exhibit 7** is a true and correct copy of the Expert Report of Fareeha Siddiqui, dated Mar. 10, 2025.
8. Attached hereto as **Exhibit 8** is a true and correct copy of bates stamped documents GRobertsJr-TH-MD-000943-45.
9. Attached hereto as **Exhibit 9** is a true and correct copy of the Expert Report of Christopher M. Mele, M.D., dated Mar. 9, 2025.
10. Attached hereto as **Exhibit 10** is a true and correct copy of the Deposition

Transcript of Christopher M. Mele, M.D., dated May 8, 2025.

11. Attached hereto as **Exhibit 11** is a true and correct copy of the Deposition Transcript of Fareeha Siddiqui, M.D., dated Apr. 29, 2025.
12. Attached hereto as **Exhibit 12** is a true and correct copy of Kazuo Tarao et al., *Real impact of liver cirrhosis on the development of hepatocellular carcinoma in various liver diseases—meta-analytic assessment*, 8 *Cancer Med.* 1054 (2019).
13. Attached hereto as **Exhibit 13** is a true and correct copy of Rongtao Lai et al., *Incidence rates of hepatocellular carcinoma based on risk stratification in steatotic liver disease for precision medicine: A real-world longitudinal nationwide study*, *PLoS Med.* (2024).
14. Attached hereto as **Exhibit 14** is a true and correct copy of Bonnie Bengtsson et al., *The risk of hepatocellular carcinoma in cirrhosis differs by etiology, age and sex: A Swedish nationwide population-based cohort study*, 10 *United European Gastroenterology J.* 465 (2022).
15. Attached hereto as **Exhibit 15** is a true and correct copy of the Deposition Transcript of Samuel Hooks, M.D., dated Jan. 29, 2025.
16. Attached hereto as **Exhibit 16** is a true and correct copy of Amit G. Singal et al., *AASLD Practice Guidance on prevention, diagnosis, and treatment of hepatocellular carcinoma*, 78 *Hepatology* 1922, 1929 (2023).

17. Attached hereto as **Exhibit 17** is a true and correct copy of *EASL [European Association for the Study of the Liver] Clinical Practice Guidelines on the management of hepatocellular carcinoma*, 82 J. of Hepatology 315 (2025).
18. Attached hereto as **Exhibit 18** is a true and correct copy of Yuri Cho et al., *Overview of Asian clinical practice guidelines for the management of hepatocellular carcinoma: An Asian perspective comparison*, 29 Clinical & Molecular Hepatology 252 (2023).
19. Attached hereto as **Exhibit 19** is a true and correct copy of bates stamped documents GRobertsJR-CA-000722, GRobertsJR-ESMS-000016-20, GRobertsJR-ESMS-000051-56, GRobertsJR-ESMS-000045-50, GRoberts-ESMS00002-6, GRobertsJR-AMG-000032-35, GRobertsJR-AMG-000028-30, GRobertsJR-CA-000209-11.
20. Attached hereto as **Exhibit 20** is a true and correct copy of the Deposition Transcript of Darryle P. Bullard, M.D., dated Feb. 13, 2025.
21. Attached hereto as **Exhibit 21** is a true and correct copy of the Deposition Transcript of Donald B. Sanders, M.D., dated Oct. 8, 2021.
22. Attached hereto as **Exhibit 22** is a true and correct copy of Marc-Andre Cornier et al., *Assessing adiposity: a scientific statement from the American Heart Association*, 124 Circulation 1996, 1997 (2011).
23. Attached hereto as **Exhibit 23** is a true and correct copy of Xuancheng Xie

et al., *Correlation analysis of metabolic characteristics and the risk of metabolic-associated fatty liver disease -related hepatocellular carcinoma*, Scientific Reports (2022).

24. Attached hereto as **Exhibit 24** is a true and correct copy of Baek Gyu Jun et al., *Impact of overweight and obesity on the risk of hepatocellular carcinoma: a prospective cohort study in 14.3 million Koreans*, 127 Brit. J. of Cancer 109 (2022).
25. Attached hereto as **Exhibit 25** is a true and correct copy of Yi Chen et al., *Excess body weight and the risk of primary liver cancer: An updated meta-analysis of prospective studies*, 48 Eur. J. of Cancer 2137 (2012).
26. Attached hereto as **Exhibit 26** is a true and correct copy of Mary E. Rinella et al., *A multisociety Delphi consensus statement on new fatty liver disease nomenclature*, 79 J. of Hepatology 1542 (2023).
27. Attached hereto as **Exhibit 27** is a true and correct copy of bates stamped document GRobertsJr-CA-000654 through GRobertsJr-CA-000655.
28. Attached hereto as **Exhibit 28** is a true and correct copy of bates stamped document GRobertsJr-ESMS-000029 through GRobertsJr-ESMS-000033.
29. Attached hereto as **Exhibit 29** is a true and correct copy of bates stamped document GRobertsJr-CA-000661 through GRobertsJr-CA-000663.
30. Attached hereto as **Exhibit 30** is a true and correct copy of Fahim Ebrahimi,

et al., *Familial coaggregation of MASLD with hepatocellular carcinoma and adverse liver outcomes: Nationwide multigenerational cohort study*, 79 J. of Hepatology 1374 (2023).

31. Attached hereto as **Exhibit 31** is a true and correct copy of bates stamped document GRobertsJr-CA-000729.
32. Attached hereto as **Exhibit 32** is a true and correct copy of Ping Wang et al., *Diabetes mellitus and risk of hepatocellular carcinoma: a systematic review and meta-analysis*, 28 Diabetes Metab. Res. Rev. 109 (2012).
33. Attached hereto as **Exhibit 33** is a true and correct copy of bates stamped document GRobertsJr-PPR-000135 through GRobertsJr-PPR-000152.
34. Attached hereto as **Exhibit 34** is a true and correct copy of bates stamped document GRobertsJR-TH-MD-001031 and GRobertsJR-TH-MD-001026-001029.
35. Attached hereto as **Exhibit 35** is a true and correct copy of bates stamped documents GRobertsJr-UABHIM-MD-000002-6, GRobertsJr-PPR-000106, and GRobertsJR-PPR-0000235.
36. Attached hereto as **Exhibit 36** is a true and correct copy of the Deposition Transcript of Mark Lockhart, M.D., dated Feb. 13, 2025.
37. Attached hereto as **Exhibit 37** is a true and correct copy of bates stamped document GRobertsJr-UABHIM-MD-00083 through GRobertsJr-UABHIM-

MD-00090.

38. Attached hereto as **Exhibit 38** is a true and correct copy of bates stamped document GROBERTSJr-SouCC-000250 through GROBERTSJr-SouCC-000251.
39. Attached hereto as **Exhibit 39** is a true and correct copy of bates stamped document GRobertsJr-UABHIM-MD-00029 through GRobertsJr-UABHIM-MD-00037.
40. Attached hereto as **Exhibit 40** is a true and correct copy of bates stamped document GRobertsJr-PPR-000093 through GRobertsJr-PPR-000097.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: May 22, 2025

Respectfully submitted,

/s/ Nina R. Rose

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Pharmaceutical Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 22, 2025, a true and correct copy of the foregoing document was served upon counsel of record via operation of the Court's electronic filing system.

Dated: May 22, 2025

Respectfully submitted,

/s/ Nina R. Rose

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